

O'Tormey, Sean P (FAA)

From: Reaves, David (FAA)
Sent: Thursday, July 14, 2022 2:22 PM
To: Louis Cody
Cc: O'Tormey, Sean P (FAA); Andrews, William CTR (FAA)
Subject: RE: Request for Information No. 1 - Louis C. Peterson (Docket FAA-2022-0825) - Response Required by August 2, 2022

Mr. Louis C. Peterson
Bonta Vita, Inc.
800 Hwy 52
Loretto, KY 40037

Dear Mr. Peterson:

I received your request for an extension of 90 days. I am permitted to authorize an extension till August 2, 2022. If you think you will not be able to submit the requested materials (see email Jul 7, 2022 below) by August 2, 2022, you may want to withdraw the petition until such time as you have all of the required materials, and then re-apply.

What You Need To Do:

If you want the FAA to process your request any further, you must send the information described above by August 2, 2022 before 11:59PM ET. We will consider your petition request open during this period.

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to david.reaves@faa.gov and Sean.P.O'Tormey@faa.gov.

If the FAA Does Not Receive the Requested Information From You:

If the FAA does not receive the requested information from you by the date indicated above, the FAA will take no further action on this petition and close the matter without notifying you further. Should you have questions or require additional time, you may reply to this email, or you may call (717) 712-1035.

Sincerely,




Aviation Safety Inspector
Operations Group | AFS-830

Flight Standards Service
800 Independence Ave, SW
Washington, DC 20591
Phone (717) 712-1035

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From: Louis Cody <louiscody124@gmail.com>

Sent: Monday, July 11, 2022 9:51 AM

To: Reaves, David (FAA) <david.reaves@faa.gov>

Subject: Re: Request for Information No. 1 - Louis C. Peterson (Docket FAA-2022-0825) - Response Required by July 20, 2022

I need an extension of at least 90 days.

Thank you

On Thu, Jul 7, 2022 at 1:22 PM Reaves, David (FAA) <david.reaves@faa.gov> wrote:

Mr. Louis C. Peterson

Bonta Vita, Inc.

[800 Hwy 52](#)

[Loretto, KY 40037](#)

Dear Mr. Peterson:

This letter is to inform you that the following information is needed for your petition dated May 24, 2022 on behalf of yourself (Docket FAA-2022-0825). This information is necessary for the Federal Aviation Administration (FAA) to process your petition.

1. Please provide a summary of your petition we can publish in the Federal Register. Your petition summary should state the rules from which you seek the exemption and contain a brief description of the nature of the exemption you seek. (See 14 CFR § 11.81)

2. Please clarify the list of regulations you are requesting relief from. Other petitioners, for similar operations have requested relief from 14 CFR §§ 61.3(a)(1)(i), 91.7(a), 91.119(c), 91.121, 91.151(b), 91.403(b), 91.405(a), 91.407(a)(1), 91.409(a)(1), 91.409(a)(2), 91.417(a), 91.417(b), 137.19(c); 137.19(d); 137.19(e)(2)(ii),(iii), and (v); 137.31(a); 137.31(b); 137.33(a) and (b); 137.42. Please also provide an explanation how your proposed exemption would provide a level of safety at least equal to that provided by the regulations and why these exemptions would be in the public interest.

3. Please provide a comprehensive training and certification program. The information you provided is not adequate; it is not a comprehensive training and certification program similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 19170, Docket No. FAA-2021-0433). The training and certification program should be a comprehensive course tailored for your proposed operations that includes theory and practical components, a pilot theory exam, and supervised operational familiarization training on agricultural spraying. Additionally, the training program requirements should include examination, flight test, and continued periodic training.

4. Please provide a comprehensive operational risk and safety manual containing a detailed risk analysis specific to your operation. The information you provided is not adequate; it is not an operational risk and safety manual similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 19170, Docket No. FAA-2021-0433). The operational risk and safety manual should identify risks specific to your operation, provide procedures to mitigate those risks, and determine whether the residual risk level is acceptable.

5. Please provide a comprehensive flight operations and procedures manual. The information you provided is not adequate; it is not a comprehensive flight operations and procedures manual similar to that provided by petitioners who have been issued similar grants of exemption (see Exemption No. 19170, Docket No. FAA-2021-0433) as part of their risk mitigation strategy. The flight operations and procedures manual should be tailored for your proposed operations, and it should include flying procedures, pre-and post-flight procedures, and maintenance information.

6. The UAS can operate only within the limitations listed in the exemption (if granted) and the manufacturers supporting documents. Please provide the following supporting documents for the exemption:

- DJI Agras T-20 Operations Manual
- DJI Agras T-20 Maintenance Manual
- DJI Agras T-20 Software and Training Manual
- DJI Agras T-20 Operational History

Please note: You may access information about applying for a UAS Exemption and Part 137 Agricultural Aircraft Operator Certificate at:

To operate a UAS for agricultural aircraft operations under 14 CFR part 137, an operator must:

1. Obtain an exemption under 14 CFR part 11
2. Obtain an agricultural aircraft operator certificate under 14 CFR part 137

3. Each pilot must obtain a 14 CFR part 107 remote pilot certificate

Here is a good website with information on UAS agricultural aircraft operations:

https://www.faa.gov/uas/advanced_operations/dispensing_chemicals/

Here are links to information on how to submit a petition for exemption:

https://www.faa.gov/sites/faa.gov/files/regulations_policies/rulemaking/Petition_For_Exemption_Guide.pdf

https://www.faa.gov/regulations_policies/rulemaking/petition

https://www.faa.gov/uas/advanced_operations/certification/section_44807/

<https://www.regulations.gov/document/FAA-2007-0001-0001>

4. Additionally, for large UAS (55 pounds or more), the PIC must hold a Class 2 Medical Certificate
5. Large UAS require an Air Traffic Control Certificate of Authorization (ATC COA).

You may use a “blanket” COA for flights at or below 400 feet:

https://www.faa.gov/uas/advanced_operations/certification/section_44807/media/44807_ClassG_BlanketCOA.pdf (PDF).

Information on how to apply for a "full" COA:

https://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/systemops/aaim/organizations/uas/coa/

To obtain an agricultural aircraft operator certificate, please see Advisory Circular (AC) 137-1:

https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentID/1031829

AC 137-1 states that the Letter of Intent (LOI) and Agricultural Aircraft Operator Certificate Application be submitted to the responsible Flight Standards (AFS) office. A list of Flight Standards District Offices (FSDO) may be found at:

https://www.faa.gov/about/office_org/field_offices/fsdo/

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Sincerely,




Aviation Safety Inspector
Operations Group | AFS-830

Flight Standards Service
800 Independence Ave, SW
Washington, DC 20591
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